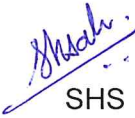






Toyo Engineering India Private Limited

Privacy Policy

REV.	DATE	DESCRIPTION	PREPARED BY	REVIEWED BY	APPROVED BY
1	10 May 2023	Amendment to Clause No. VII and IX	 SHS	 SBS	 SBS
0	24 July 2017	Privacy Policy	SDP	RYK	Management Committee



Toyo Engineering India Private Limited

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I. Introduction

Toyo Engineering India Private Limited (hereinafter referred to as “the Company”) is committed to respect privacy of every person, including employees of the Company, business partners including vendors, contractors, sub-contractors, customers, clients and all others who share their sensitive personal data or information (“Sensitive Personal Information”) with the Company.

II. Applicability / Objective of the Policy

This Privacy Policy (‘Policy’) is applicable to employees of the Company, business partners including vendors, contractors, sub-contractors, customers, clients and all others (‘Information Providers’), who disclose Sensitive Personal Information to the Company for lawful business requirements of the Company.

The Objective of this Policy, as amended from time to time, is to give the Information Providers an understanding on how the Company intends to collect, receive, possess, store, share, transfer, handle, deal with and use the Sensitive Personal Information provided.

Sensitive Personal Information of the Information Providers may be required to be collected, maintained and transferred for business and official purposes as well as for government, tax / revenue requirements with the express consent of the Information Providers.

The Company shall ensure confidentiality of such Sensitive Personal Information and grievances, if any, related to such issues shall be resolved by the Grievance Officer appointed by the Company for this purpose.

III. What information the Company may collect?

The Company may collect the following types of Sensitive Personal Information, including but not limited to:

- Name, gender, marital status, religion, residential address, telephone / mobile numbers, e-mail address, photographs, educational qualifications, details of relatives, family background, details of past employment, past compensation, background checks, investment details, vehicle details (in the case of employees, wherever relevant);
- Financial details such as Bank Account, PAN Card, Aadhar Card, Passport, Salary, Provident Fund details;



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- Password used for the Company provided systems, websites/web pages, etc.;
- Physical, physiological and mental health condition;
- Medical records and history;
- Biometric information.
- Record of Criminal Cases

IV. Purpose of Collection, Sharing and Transferring of Sensitive Personal Information

The Company may collect, use, receive, possess, store, disclose, process and transfer the Sensitive Personal Information for various purposes, including but not limited to, the following lawful purposes:

- To enable functioning of the Company's business,
- In connection with a variety of purposes relating to employment or engagement of employees, including but not limited to, general HR administration; organization planning and management;
- Compliance with company policies, code of conduct and internal regulations;
- Legal, judicial, governmental and regulatory compliance;
- Tax administration and compliance;
- Overseas affiliates' compliance with foreign laws and co-operation with overseas regulators;
- To transfer to IT services providers;
- To administer or otherwise carry out obligations in relation to any contract the Information Providers have with the Company; and
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of the law or as otherwise required by law.

V. Consent

The Information Providers consent that the collection, usage, storage, disclosure, processing and transfer of any Sensitive Personal Information or any other information as disclosed by them under this Policy shall not cause any loss or wrongful gain to the Information Providers if the same is used for the above-mentioned lawful purposes.

The Information Providers authorize the Company to exchange, disclose, transfer, share, part with the Sensitive Personal Information and/or any information provided, within or outside India for the above purposes.



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At the time of or prior to the collection of Sensitive Personal Information by the Company, the Information Providers have the right not to provide such information to the Company. Further, the Information Providers, at any time subsequent to providing the information, also have the option to withdraw the consent given earlier to the Company. The decision to not provide any Sensitive Personal Information or withdrawal of consent later shall be given in writing by the Information Providers to the Company and to the extent possible accompanied by reasons. [It is clarified that where any Information Provider chooses not to provide to the Company, the permission to collect, use, receive, possess, store, disclose, process and transfer the Sensitive Personal Information or later on withdraws the consent so given in respect of the Sensitive Personal Information so collected, the Company may not have sufficient information about the Information Provider and may not be able to deal with him or be able to offer him or continue his employment with the Company or to provide him with the employee benefits under law and the Company's internal policy. In such cases, the Company reserves the right, at its sole discretion, not to deal with such Information Providers or not to offer employment to the Information Provider and/or withdraw his employment offer and/or terminate the Information Provider's employment with the Company and/or discontinue all or part of his employment benefits and/or take any other action that the Company may decide in this regard.]

VI. Security

The Company has adopted reasonable security practices and procedures to ensure that the Sensitive Personal Information is collected and preserved in a secured manner.

While the Company will endeavour to take all reasonable and appropriate steps to keep secure any information and prevent its unauthorized access, the information providers agree and acknowledge that the Company cannot provide any absolute assurance regarding the security of the Sensitive Personal Information. To the fullest extent permissible under applicable laws, the Company disclaims any liability in relation to any breach of security or loss or disclosure of information in relation to the Sensitive Personal Information.

If the Information Provider needs to update or correct the Sensitive Personal Information, he may contact the designated person for the same.



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VII. Data Retention

It is the Company's policy to retain the Sensitive Personal Information of the Information Providers only as long as the Company believes it to be necessary for the purposes for which such Sensitive Personal Information was collected, subject to any legal requirements for the information to be retained for longer period, if any.

It is the Company's Policy to retain the Sensitive Personal Information of the employees of the Company for a period of 8 years as per the requirement of the Income Tax Act.

VIII. Changes to the Privacy Policy

The Company reserves the right to revise and update this Privacy Policy at any time without expressly informing the Information Providers. Any such revisions will be effective on and from the date of posting the same to the intranet / internet website of the Company, and will apply to all information collected both prior to and following the effective date. You should visit the website and intranet periodically to review the current policies with regard to Sensitive Personal Information. Use of the intranet / visit to internet website of the Company following any such revisions will be deemed acceptance by the Information Providers of such revisions.

IX. Grievance

The Company has nominated Ms. Sharvari Salvi as the Grievance Officer of the Company. The Information Providers may approach the Grievance Officer if they have any grievance, questions or concerns with respect to the processing and use of their Sensitive Personal Information. The Grievance Officer can be contacted by mail at the email: in.contact@toyo-eng.com.

Note:

The policy will be overall governed by the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 framed under the Information Technology Act, 2000.

Copy of the Act / Rules is available at the Company Secretary's Office.
